



July 7, 2020

VIA ECF

Hon. Robert W. Lehrburger
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Avalon Holdings Corporation v. Guy Gentile and Mintbroker International, Ltd.,
18-cv-7291 (VSB)(RWL)*
*New Concept Energy, Inc. v. Guy Gentile and Mintbroker International, Ltd.,
18-cv-8896 (VSB)(RWL)*

Dear Judge Lehrburger:

We write on behalf of all parties in the above-captioned matters to advise the court that Plaintiffs and Defendants intend to move for summary judgment and to propose a briefing schedule for said dispositive motions.

Specifically, the parties propose the following filing dates:

Motions for Summary Judgment to be due on August 7, 2020;
Opposition briefs to be due on September 14, 2020; and
Reply briefs to be due on September 25, 2020.

Respectfully submitted,

/s/ Miriam Tauber

Miriam Tauber
MIRIAM TAUBER LAW PLLC

David Lopez
LAW OFFICES OF DAVID LOPEZ

*Attorneys for Plaintiffs Avalon Holdings
Corporation and New Concept Energy, Inc.*

/s/ Danielle McLaughlin

Danielle McLaughlin; Adam Ford; Robert Landy
FORD O'BRIEN LLP

*Attorneys for Defendants Guy Gentile and
Mintbroker International, Ltd.*